

COLSON LAW

Colson Law PLLC  
80 Broad Street, 19th Floor  
New York, NY 10004  
(212) 257-6455  
www.colsonlaw.com

February 22, 2022

By ECF

Honorable Lewis Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Cole Bridges*, 21 Cr. 65 (LJL)

Dear Judge Liman:

We write to respectfully request a one-month extension of the deadline for defense expert notices and reports, currently due by March 14, 2022. *See* Dkt. No. 29 (1/10/2022). The government takes no position on our request.

As the Court is aware, the defense has retained a forensic psychiatric expert to evaluate Mr. Cole. The expert has made every effort to complete the evaluation on time, but it is taking significantly longer than expected. In-person visits at the Metropolitan Detention Center have been suspended on and off for the past three months, including during the national lockdown, which lasted several weeks. The suspensions have increased the demand for video time slots and, given the number of attorneys who need to confer with their clients, the MDC limits counsel to just 60 to 90 minutes per call. Thus, the expert has been given no choice but to conduct the interview in stages, which is not conducive to timely completion. In light of these limitations, he will be unable to complete the report until mid-April 2022.

Thank you for your consideration.

Respectfully submitted,

/s/

Deborah Colson  
Sabrina Shroff  
*Attorneys for Cole Bridges*

cc: Government Counsel